

EXHIBIT 1

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

CASE NUMBER: 2:22-CV-017-RWS

SANTANA BRYSON, et al.,

Plaintiffs,

vs.

ROUGH COUNTRY, LLC,

Defendant.

* * * * *

THE ORAL PROCEEDINGS
OF THE DEPOSITION OF G. BRYANT BUCHNER
JULY 11, 2024

REPORTER: Paul Morse
Certified Court Reporter
and Notary Public

1 was run in October-ish of '23. The depo was in
2 January. And I hadn't opened the file or
3 looked at it. And when we went to retrieve it,
4 it basically didn't exist. The run file did
5 not exist. And so we could not -- we did
6 everything we could to try to locate it and
7 find it. And all that we can think of is that
8 something happened during the save process.

9 And so I had -- just had no idea that that
10 thing wasn't there. I hadn't looked for it in
11 months. So that's -- that's the unforeseen
12 technical issue. It happens to, you know, all
13 of us at times when you think you've saved
14 something and it didn't get saved properly or
15 maybe there was a corruption in the -- you
16 know, on the computer disc somewhere. I don't
17 know.

18 Maybe somebody opened it later on and
19 thought it was something else and moved it to a
20 folder and we can't find it. I don't know.

21 Q. What is the process after you run
22 an HVE simulation to save the files associated
23 with that simulation?

1 A. Well, it -- it really ought to be
2 saved and moved into the -- you know, into the
3 job file and put into engineering analysis,
4 which you've probably seen my EA folders,
5 engineering analysis folders. It wasn't --
6 that -- that final step apparently didn't
7 happen. It was still on the simulation
8 computer. At least that's where we thought it
9 was. And but it didn't -- it just wasn't in
10 any other place. I don't think it ever got
11 moved was the problem. That's the reason I --
12 I needed to go get a copy of it.

13 Q. And when you say later on in
14 this -- on this page that -- at the bottom you
15 said since the simulation had been corrupted,
16 what do you mean by the term corrupted?

17 A. Well, whatever we found did not --
18 we went back to the archives and everything.
19 We never found anything that looked like the
20 accident one. And it's even suspect that the
21 printout that I was using was -- was from the
22 one that I had looked at back in October.

23 So the word corrupted is kind of a general

1 A. I don't know as I sit here, no.

2 Q. You don't know if there's hinges
3 on the Escape?

4 A. I don't know the height of it, but
5 I do see the hinges.

6 Q. Right. And so you don't know the
7 height of the hinges?

8 A. Not as I sit here, no.

9 Q. Okay. And you didn't factor in
10 any of those heights in analyzing the photo
11 parallax here with this --

12 A. Of course I did. I used -- I used
13 something that was higher than the roof of the
14 Escape and something that was lower than the
15 roof of the Escape to get a range. We know
16 that the roof of the Escape is above the hood
17 of the F-250. But the roof of the Escape is
18 below the roof of the F-250.

19 Q. Right. So the impact -- the
20 center line impact then following that logic
21 would be somewhere between the red dotted line
22 and the green dotted line?

23 A. Yes.

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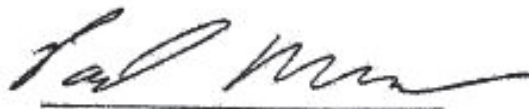
REPORTER'S CERTIFICATE

STATE OF ALABAMA,

BALDWIN COUNTY,

I, Paul Morse, Certified Court Reporter
and Commissioner for the State of Alabama at
Large, do hereby certify that the above and
foregoing proceedings was taken down by me by
stenographic means, and that the content herein
was produced in transcript form by computer aid
under my supervision, and that the foregoing
represents, to the best of my ability, a true
and correct transcript of the proceedings
occurring on said date and at said time.

I further certify that I am neither of
kin nor of counsel to the parties to the action
nor in any manner interested in the result of
said case.

A handwritten signature in black ink, appearing to read "Paul Morse", is written over a horizontal line.

Paul Morse, CCR

ACCR #588 Expires 9/30/24